

UCI Administrator Annual Reporting - Practical and technical guidance



## **UCI Administrator Annual Reporting - Practical and technical guidance**

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### **Update information**

Date	Version	Changes	
30/06/2023	1.0	Publication of the document	
05/07/2023	1.1	Modification of the name and conditions of the "hrUciaRationalOfOrgChanges" field in the "Human resources" section of Annex I	
27/09/2023	1.2	<ul> <li>New v2.0.0 version of the JSON Schema</li> <li>Changes in Annex I regarding the fields below: <ul> <li>(new) navFaActiveInvestBreachesNa</li> <li>navFaActiveInvestBreaches</li> <li>(new)</li> <li>trHardwareAndSoftwareIctRelatedIssuesDescription</li> </ul> </li> </ul>	
12/04/2024	1.3	Remove the duplicate option "FinRepDraw" in CcPoliciesCombo and CcDelegationsCombo, and add the "DocDrawDisp" option (see Annex II)	



## 1. Glossary and objectives

#### 1.1 Glossary

Notion	Definition		
1993 Law	Law of 5 April 1993 on the financial sector		
2010 Law	Law of 17 December 2010 relating to undertakings for collective investment		
2013 Law	Law of 12 July 2013 on alternative investment fund managers		
BucketA bucket is a container for objects. S3 stores data as within buckets. An object is a file and any metadata that de the file. Each entity manages its own separate buckets to I for each report type.			
IFMs	Generic term referring to investment fund managers		
IT Expert	The "IT Expert" is an eDesk specific role that is granted by the "Advanced User" of the entity to the person managing access to the S3 API. A person with this role is responsible for creating, viewing and revoking access keys.		
S3	S3 – or "simple storage service" – is the object storage protocol (through a web service interface) used by the CSSF for the file exchange. In this context, S3 simply refers to the protocol for managing object storage and does not rely on any services provided by commercial cloud providers.		
UCI	Generic term referring to regulated UCIs established in Luxembourg, non-regulated UCIs established in Luxembourg and foreign UCIs		
UCI Administrator Annual Reporting	Annual reporting by UCI administrators of information regarding their business activities and resources as detailed in Annex B of Circular CSSF 22/811		

#### 1.2 Objectives

The general objective of this document is to provide practical and technical information on the UCI Administrator Annual Reporting.

The first part of the document aims at providing information on the scope of the reporting obligation and outlines the CSSF expectations on the manner in which the information should be submitted to the CSSF.



The second part of the document aims at providing technical details in relation to the UCI Administrator Annual Reporting:

- Technical overview of the reporting system;
- Data and file format of the reports;
- Data validation and feedbacks.

## 2. Scope

#### 2.1 Who must submit the report?

A UCI administrator in scope of Circular CSSF 22/811 must communicate to the CSSF, on an annual basis, information regarding its business activities and resources pursuant to point 7 of Circular CSSF 22/811.

The following entities, which perform UCI administration function(s) and which are in scope of Circular CSSF 22/811, should report the requested information through one of the reporting tools described in this User Guide:

- Management companies incorporated under Luxembourg Law and subject to Chapter 15 of the 2010 Law;
- Management companies incorporated under Luxembourg Law and subject to Chapter 16 of the 2010 Law;
- Alternative investment fund managers authorised under Chapter 2 of the 2013 Law;
- Foreign IFMs pursuing the activity of UCI administrator for UCIs established in Luxembourg;
- Regulated Luxembourg UCIs;
- Credit institutions authorised under Part I, Chapter 1 of the 1993 Law;
- Luxembourg branches of credit institutions governed by foreign laws and authorised under Part I, Chapter 3 of the 1993 Law;
- Registrar agents authorised under Part I, Chapter 2 of the 1993 Law;
- Client communication agents authorised under Part I, Chapter 2 of the 1993 Law, only for the client communication function as described in section 2.2.5 of Circular CSSF 22/811;
- Administrative agents authorised under Part I, Chapter 2 of the 1993 Law, only for the NAV calculation and accounting function and client communication function as described, respectively, in sections 2.2.4 and 2.2.5 of Circular CSSF 22/811.



#### 2.2 When does a UCI administrator have to report?

The CSSF must receive the aforementioned information at the latest five months after the financial year-end of the UCI administrator. The reporting requirement starts as from 30/06/2023. For example, a UCI administrator with a financial year ending on 30/06/2023 should first report the requested information no later than 30/11/2023. A UCI administrator with a financial year ending on 31/12/2023 should provide the CSSF with the reporting no later than 31/05/2024.

### 3. Practical guidance

Please refer to Annex I.

## 4. Technical guidance

The UCI Administrator Annual Reporting is possible through two different channels:

- via an online form available on the eDesk platform;
- via S3 system by using a structured exchange file.

#### 4.1 eDesk online form

An online form is available on the eDesk platform via the "UCI Administrator Reporting Tool" module (<u>https://edesk.apps.cssf.lu/ucia/edesk-ucia/</u>).

#### 4.1.1 Authentication

The person in charge of submitting the report is required to have an eDesk account (available with a LuxTrust authentication) and must be linked to the relevant entity. Further details can be found in the User Guide ("Authentication and user account management") from the dedicated section of the CSSF eDesk Portal homepage: <a href="https://edesk.apps.cssf.lu/edesk-dashboard/dashboard/getstarted">https://edesk.apps.cssf.lu/edesk-dashboard/dashboard/getstarted</a>.

#### 4.1.2 Dashboard

The main dashboard lists all reporting linked to the entity represented by the connected user. Those listed reporting are either in draft status or already submitted.

From the dashboard, it is possible for any user linked to the entity to see the details of a reporting. It is also possible to delete any report in draft status, i.e. not yet submitted to the CSSF.



#### 4.1.3 Creation and submission of a report

Through a dedicated "Create report" action on the dashboard, a user linked to the relevant entity can initiate the creation of a report.

A first step consists of specifying which year-end this report is related to, starting on 30/06/2023. Please note that if a relevant year-end is not presented for a relevant entity, contact the CSSF via <u>uciar@cssf.lu.</u>

Once the report is filled in, upon submission, a control will list any potential errors. If no error is detected, the report will be sent, and its status changed to "SUBMITTED".

In case a report needs to be corrected, a new report can be initiated, based on the same year-end.

#### 4.1.4 Export PDF

Whether a report is submitted or not, an action is available to export the report in PDF format. It is accessible through a report's detailed view, under "Actions" in the navigation menu on the left side.

#### 4.2 S3 system reporting technical specifications

Method of transmitting reports via Application Programming Interface can be found on our website following the link.

In the eDesk IT management console, the "IT Expert" must create a bucket "**UCI** Administrator – Annual reporting".

4.2.1 Reporting file

#### 4.2.1.1 Reporting format

The data concerning UCI Administrator Annual Reporting shall be reported in the JSON (JavaScript Object Notation) format.

The JSON report must be compressed in a ZIP format. In addition to the JSON report, the ZIP archive can contain a PDF file corresponding to the entity's current organisational chart requested if the answer to the question "Any significant change to the last organisation chart provided to the CSSF?" is "Yes" in the "Human resources" section of the questionnaire.

#### UCI Administrator Annual Reporting document JSON schema

The schema concerning the reporting is available at:



Publicatio n date	Version	Link	Release note
30/06/20 23	1.0.0	<u>schema</u>	Initial version
27/09/20 23	2.0.0	<u>schema</u>	<ul> <li>Changes regarding the fields below:</li> <li>(new) navFaActiveInvestBreachesNa</li> <li>navFaActiveInvestBreaches</li> <li>(new) trHardwareAndSoftwareIctRelatedIss uesDescription</li> </ul>

#### 4.2.1.2 Submission process

The ZIP file MUST be uploaded to the "submission" folder in S3. No upload is allowed into other folders (e.g. "feedback" folder is only dedicated to CSSF feedbacks).

#### 4.2.1.3 ZIP technical specifications

Reporting file must be transmitted via a compressed .zip format containing one single .json file and an optional .pdf file.

Here are the specifications for ZIP archive:

Compression algorithm	RFC 1951 (DEFLATE Compressed		
	Data Format Specification		
	version 1.3)		
Multi-volume archives (multi-part zipfile)	No		
Maximum size of a file in the archive	2 Gigabytes		
Codepage	UTF-8		

## 4.2.1.4Naming conventionsi.ZIP file

The mandatory file naming convention for .zip files is specified below.

Format: UCIAR-ENNNNNNN-YYYY-MM-DD-UUID.ext



C o d	Meaning	Structure	Authorised value	
е				
U C I A R	Reporting type	Char(5)	'UCIAR' (constant)	
-	Separator	Char(1)	`-' (constant)	
E	Reporting entity	Char(1)	Entity type : `A', `B', `I', `K', `O', `P' or `S'	
	Identification number	Number(8)	0000000199999999 (CSSF code of the entity)	
-	Separator Char(1)		`-' (constant)	
Y Y Y Y	Financial Year- end – Year	Char(4)	Year of this reporting's related financial year-end	
-	Separator	Char(1)	`-' (constant)	
M M	Financial Year- end – Month	Char(2)	Month of this reporting's related financial year-end	
-	Separator	Char(1)	`-' (constant)	
D D	Financial Year- end – Day	Char(2)	Day of this reporting's related financial year-end	
U U I D	Unique identifier (ReportUid)	UUID format	<u>Unique identifier following the rfc 4122</u> norm	



е	Extension	Char(5)	.zip (constant)
x t			





#### **UUID** specifications

The **UUID** is necessary to uniquely identified a report. It is also used to prevent a file to be processed several times.

A ZIP file with the same UUID of another ZIP file concerning the same entity will be rejected with the error UCIAR008 (cf. chapter 4.2.2.2.3).

The expected format of an UUID is:

where each X data can have a value from 0 to 9 or from a to f (hexadecimal authorised characters).

You can find more information about the UUID on Universally Unique Identifier (UUID).

ii. JSON report

No specific naming convention will apply for the JSON report included in the zip file, but it is recommended to use report.json.

iii. PDF file

No specific naming convention will apply for the optional "organisational chart" document included in the ZIP file, but it is recommended to use orgchart.pdf.

Example:

Archive	UCIAR-B0000xxxx-2023-12-31-c15473ff-53c7-d38c-553e- 93bdf950121f. <b>zip</b>
JSON report	report. <b>json</b>
PDF file	orgchart. <b>pdf</b>

4.2.2 CSSF feedback file

It is up to the submitter to monitor transmission correctness.

A feedback file in JSON format is systematically generated for each file transmitted and made available in the "feedback" folder.

The schema concerning the data of the generated feedback is available in the <u>CSSF</u> <u>feedback file</u>.

Please ensure that you have received a feedback file for the last file sent before submitting a new file concerning a same entity. Feedback generation could take some time. If you do not receive a response within one working day, please contact our dedicated support team at <u>uciar@cssf.lu</u>.



#### 4.2.2.1 Naming convention

Feedbacks from the CSSF are received in the "feedback" folder of the S3 transfer client.

Format: SourceFileName\_FEEDBACK\_TrackingCode.json

Code	Meaning	Structure	Authorised value
SourceFileName	Reporting entity	Char(N)	Submitted file name - Refer to the ZIP File name structure in section 4.2.1
-	Separator	Char(1)	`_' (constant)
FEEDBACK	File type	Char(8)	FEEDBACK (constant)
TrackingCode	Unique identifier	Char(16)	Unique identifier created by the CSSF system after file submission SFOYYYYMMDDXXXXXX where: YYYYMMDD: year, month and day of submission XXXXXX: daily increment
-	Separator	Char(1)	`_' (constant)
.ext	Extension	Char(5)	.json (constant)

#### 4.2.2.2 File content

A feedback file contains several information:

- A status at the report level;
- ReportUids previously processed;
- Feedback messages at the report level.

4.2.2.2.1 Report status

The report status can have two different values:

- REJECTED when the report is entirely rejected. That is the case when the archive is not technically compliant.
- ACCEPTED when the archive is technically compliant and all the relevant data to be included in the report have been correctly reported.



4.2.2.2.2 ReportUids previously processed

The feedback file lists the unique identifiers (reportUid) of the last reports concerning the fund in the CSSF processing order (most recent report at the top of the list).

4.2.2.2.3 Feedback message at report level

If a report has the ACCEPTED status, a feedback message with the ``UCIAR000'' code is sent.

If a report has the REJECTED status, the possible errors at report level, are listed in the table below with the severity "ERROR".

#### Feedback messages

Code	Message	Severity
UCIAR000	The report of the UCI Administrator has been accepted by the CSSF	INFO
UCIAR001	The archive is corrupted	ERROR
UCIAR002	The archive filename is invalid. The expected naming convention must follow the regex: UCIAR- (? <entitycssfcode>[BASOKPI]\\d{8})- (?<exerciseenddate>[1-9][0-9][0-9]{2}-([0][1- 9] [1][0-2])-([1-2][0-9] [0][1-9] [3][0-1]))- (?<reportuid>[0-9a-f]{8}-[0-9a-f]{4}-[0-9a-f]{4}-[0- 9a-f]{4}-[0-9a-f]{12}).zip</reportuid></exerciseenddate></entitycssfcode>	ERROR
UCIAR003	The archive must contain a single JSON file	ERROR
UCIAR004	Number of files into the archive cannot exceed 2 files	ERROR
UCIAR005	The archive file cannot exceed 20 MB	ERROR
UCIAR006	The submitter is not authorised to transmit a report for this entity	ERROR
UCIAR007	The entity defined in the archive filename is not in scope for the reported period	ERROR
UCIAR008	The archive with reportUid "reportUid" has already been received for this entity	ERROR
UCIAR009	JSON file does not respect JSON Schema	ERROR



UCIAR010	The unique identifier "reportUid" in the JSON file is	ERROR
	different from the unique identifier used in the archive	
	name	
UCIAR011	The CSSF code of the entity in the JSON file is different	ERROR
	from the CSSF code of the entity used in the archive	
	name	
UCIAR012	The year-end date of the entity in the JSON file is	ERROR
	different from the year-end date used in the archive	
	name	
UCIAR013	Based on information provided, the organisational chart	ERROR
	must be attached	
UCIAR014	At least one UCI administration activity is required	ERROR
UCIAR015	Field <fieldname1> is required due to field value</fieldname1>	ERROR
	<fieldname2:value></fieldname2:value>	
L		

#### 4.3 Reporting entities obligations

#### 4.3.1 Data quality

Entities are strongly advised to review and validate the reporting files (ZIP and JSON files) before any submission.

Files must be validated against the JSON schema provided by the CSSF.

#### 4.3.2 Review the feedback files and correct the rejected reports

Entities must ensure that all feedback files are properly analysed and that any rejected data are corrected and resubmitted.

#### 4.4 Testing with CSSF

CSSF offers ways for entities to test their reporting file submission through S3 solution before going into production:

- Connectivity check;
- Dedicated testing environment.

#### 4.4.1 Connectivity check

A connectivity check is highly recommended before the Go-Live.



Besides the main "UCI Administrator – Annual reporting" service, a dedicated "Echo Service" is at your disposal to ensure the good connectivity between your entity and our systems.

The authentication steps are similar to the regular report in regard to getting the credentials (see **Error! Reference source not found.**) and uploading a file (see REF \_Ref130457768  $\r h$  Error! Reference source not found.).

The "IT Expert" has to create a new access on the "Echo" bucket that is presented below in order to get the right S3 credentials.



You can upload a dummy file to the "submission" folder. If the connectivity check is completed, you will get a dummy feedback file as confirmation in the "feedback" folder.

Please note that this service remains always available.

In case you are unable to connect to the Echo Service or that you are not receiving any feedback, please contact <u>uciar@cssf.lu</u>.

4.4.2 Dedicated testing environment

End-to-end tests can be performed, on demand, in a dedicated environment.

This environment will be open for a well-defined timeframe and its stability will be guaranteed at best effort level. There are differences between entities descriptive data on this environment and production data. This may have an impact on controls performed, especially scope controls.

For this testing environment, S3 credentials will directly be provided by the CSSF (without enrolment).

All data transmitted on this environment must be understood as test data only.



If you are interested in testing reports submission to the CSSF through this testing environment, please send an email to <u>uciar@cssf.lu</u> to receive the necessary information.

Please note that the CSSF will need a range of external IP addresses of your entity to configure the testing environment.

## 5. Contact information

If you have any questions, please contact <u>uciar@cssf.lu</u>.

To facilitate the processing of your request, please provide the entity's CSSF code and name.



## Annex I – Synopsis on information to be collected for UCI Administrator Annual Reporting

For general guidance on filling in the UCI Administrator Annual Reporting, please refer to the JSON schema linked in section 4.2.2.2.1 of the present document.

Below is guidance for each field:

- Which requires a specific answer (closed questions may refer to codes, listed in annex II);
- Which triggers another section / question that becomes required to fill; and
- For which a specific guidance has been provided by the CSSF.

#### "General Information" section

Information to be provided	Technical attribute of the information to be provided in the JSON file	CSSF guidance
Registrar function NAV calculation and accounting function Client communication function	entityRgstrActivity entityNavFaActivity entityCcActivity	UCI administration activity carried out by the relevant entity. "Y" or "N" answer is required. For each activity answered by "Y", the corresponding dedicated section must be filled in. At least one answer "Y" is expected (see rule UCIAR014 in 4.2.3.2.2)

# "Information on the activity of registrar function", "Information on the activity of NAV calculation and accounting function" and "Information on the activity of client communication function" sections

Please note that, based on the UCI administration activity(ies) carried out by the relevant entity, several information must be reported by activity. Therefore, the guidance below is explained once by information type.



Information to be provided	Technical attribute of the information to be provided in the JSON file	CSSF guidance
"Information on the activity of registrar function" section	rgstrUciaBusiness	This section must be filled in if the answer to "entityRgstrActivity" is "Y"
"Information on the activity of NAV calculation and accounting function" section	navFaUciaBusiness	This section must be filled in if the answer to "entityNavFaActivity" is "Y"
"Information on the activity of client communication function" section	ccUciaBusiness	This section must be filled in if the answer to "entityCcActivity" is "Y"
Volume in terms of net assets (in EUR)	rgstrAum navFaAum ccAum	Net assets should be expressed in EUR (not millions of EUR or thousands of EUR) – Net assets of five hundred million should be reported as "500 000 000"
Regulated UCIs established in Luxembourg administered	rgstrRegLuxUCI navFaRegLuxUCI ccRegLuxUCI	Umbrella UCI with multiple compartments must be counted only once
Non-regulated UCIs established in Luxembourg administered	rgstrNonRegLuxUCI navFaNonRegLuxUCI ccNonRegLuxUCI	Umbrella UCI with multiple compartments must be counted only once





Foreign UCIs administered	rgstrForeignUci navFaForeignUci ccForeignUci	Umbrella UCI with multiple compartments must be counted only once
Daily NAVs administered	rgstrDailyNAV navFaDailyNAV ccDailyNAV	Number of UCIs with daily NAV should be reported (not the number of NAVs effectively calculated over the period)
Weekly NAVs administered	rgstrWeeklyNAV navFaWeeklyNAV ccWeeklyNAV	More frequent NAVs do not need to be included
Monthly NAVs administered	rgstrMonthlyNAV navFaMonthlyNAV ccMonthlyNAV	More frequent NAVs do not need to be included
Quarterly NAVs administered	rgstrQuarterlyNAV navFaQuarterlyNAV ccQuarterlyNAV	More frequent NAVs do not need to be included
Yearly NAVs administered	rgstrYearlyNAV navFaYearlyNAV ccYearlyNAV	More frequent NAVs do not need to be included
Number	rgstrNbComplaintsErrors	Complaints and errors reported below should only relate to the registrar function (excluding complaints and errors relating to other functions)
Number	navFaNbComplaintsErrors	Complaints and errors reported below should only relate to the NAV calculation and accounting function (excluding complaints and errors relating to other functions)





Number	ccNbComplaintsErrors	Complaints and errors reported below should only relate to the client communication function (excluding complaints and errors relating to other functions)
Material NAV errors for regulated UCIs established in Luxembourg	rgstrMaterialNavErrorsForRegLuxUCI navFaMaterialNavErrorsForRegLuxUCI	As defined by Circular CSSF 02/77
Material NAV errors for which the UCI administrator is contractually responsible for regulated UCIs established in Luxembourg	rgstrMaterialNavErrorsWithUciAdminRe sponsible navFaMaterialNavErrorsWithUciAdminR esponsible	As defined by Circular CSSF 02/77
Corrected NAV	rgstrCorrectedNav navFaCorrectedNav	Number of NAV which have been corrected after publication / disclosure to investors
Corrected NAV for which the UCI administrator is contractually responsible	rgstrCorrectedNavWithUciAdminRespo nsible navFaCorrectedNavWithUciAdminResp onsible	Number of NAV which have been corrected after publication / disclosure to investors



Is the UCI administrator in charge of compliance monitoring of the investment policy and restrictions as detailed in point 13 of Circular CSSF 22/811?		Applicable to UCI administrators which are in charge of compliance monitoring of the investment policy and restrictions as detailed in point 13 of Circular CSSF 22/811. "Y" or "N" answer is required.
If yes, number of active investment breaches	navFaActiveInvestBreaches	Must be filled in if the answer to "navFaActiveInvestBreach esNa" is "Y"
Procedures	rgstrProcedures navFaProcedures ccProcedures	UCI administrators should provide the last review date of the relevant procedure for each thematic covered in the drop-down menu (whether documented in a common manual or in separate written procedures)
List of procedures / processes related to the registrar function	rgstrProceduresListWithThematicsCove red	Selection must be done using an option from "RgstrPoliciesCombo" (see Annex 2)
List of procedures / processes related to the NAV calculation and accounting function	navFaProceduresListWithThematicsCov ered	Selection must be done using an option from "NavFaPoliciesCombo" (see Annex 2)



		1
List of procedures / processes related to the client communication function	ccProceduresListWithThematicsCovere d	Selection must be done using an option from "CcPoliciesCombo" (see Annex 2)
Please specify	rgstrProceduresListWithThematicsCove redOther navFaProceduresListWithThematicsCov eredOther ccProceduresListWithThematicsCovere dOther	If the related process selected is "Oth", this information must be filled in.
Delegated task(s), if applicable	rgstrDelegatedTask	Selection must be done using an option from "RgstrDelegationsCombo" (see Annex 2)
Delegated task(s), if applicable	navFaDelegatedTask	Selection must be done using an option from "NavFaDelegationsCombo" (see Annex 2)
Delegated task(s), if applicable	ccDelegatedTask	Selection must be done using an option from "CcDelegationsCombo" (see Annex 2)
Please precise	rgstrDelegatedTaskOther navFaDelegatedTaskOther ccDelegatedTaskOther	If the related delegated task selected is "Oth", this information must be filled in.
Critical or important	rgstrDelegatedTaskCritical navFaDelegatedTaskCritical ccDelegatedTaskCritical	Criticality of the related delegated task. "Y" or "N" answer is required.
Delegate - Country of residence	rgstrDelegateCountryResidence navFaDelegateCountryResidence ccDelegateCountryResidence	Country of residence of the related delegate. Must be filled in according to ISO 3166-1 2 digits country code.
		l



#### "Human resources" section

Information to be provided	Technical attribute of the information to be provided in the JSON file	CSSF guidance
Do you have any secondee in the UCI administration?	hrUciaAnySecondee	Secondee(s) should encompass employee(s) seconded or provided by an entity belonging to the same group or by a third company. "Y" or "N" answer is required.
Number of secondees in the UCI administration, if applicable	hrUciaNumberSecondees	Must be filled in if the answer to "hrUciaAnySecondee" is "Y"
Any significant change to the number of employees?	hrUciaAnyEmployeesChanges	UCI administrators must assess the importance of changes. However, the CSSF considers that a staff turnover/increase/decrease of more than 20% is, in principle, significant. Similarly, changes in key roles should, in principle, be considered as significant. "Y" or "N" answer is required.
Any significant change to the last organisation chart provided to the CSSF?	hrUciaAnyOrgChanges	UCI administrators must assess the importance of changes (taking into account, notably, reporting lines). "Y" or "N" answer is required. If the answer is "Y", the current organisational chart of the relevant entity as to be provided as explained in 4.2.2.2.4



If Yes, rational of	hrUciaRationalOfOrgOr	Must be filled in if the answer to
the changes	EmployeesChanges	"hrUciaAnyEmployeesChanges"
	Linployeeschanges	is "Y" or
		"hrUciaAnyOrgChanges" is "Y"

#### "Technical resources" section

Inform ation to be provide d	Technical attribute of the information to be provided in the JSON file	CSSF guidance
Any change?	trHardwareAndSoftwareAnyChang e	"Y" or "N" answer is required.
If any, descripti on of major ICT related issues including system outage duration, root cause and mitigatin g or correctiv e measure s.	trHardwareAndSoftwareIctRelated IssuesDescription	Must be filled in if the answer to "trHardwareAndSoftwareIctRelat edIssuesNumber" is superior to 0





## Annex II – Codes required in the report for closed questions

Reference (if applicable)	Label	Code for JSON file
All questions requiring a "Y" or "N" answer	Yes	Y
r or in answer	No	Ν
RgstrPoliciesCombo	Conflict of interests	Соі
	Client onboarding	CliOnb
	Investor onboarding	InvOnb
	Reception and execution of the subscription, redemption, transfer and cancellation orders	RecepExeSubRed
	Maintenance of the unit- /shareholder register	RegMaint
	Distribution of the income generated by the UCI to investors	IncDistri
	Drawing-up of the subscription or redemption contract notes and the certificates of title and dispatch of such documents to the individual investors	DocDrawDisp
	Delegation	Delegation
	Other	Oth
RgstrDelegationsCombo	Investor onboarding	InvOnb
	Reception and execution of the subscription, redemption, transfer and cancellation orders	RecepExeSubRed
	Maintenance of the unit/shareholder register	RegMaint



Reference (if	Label	Code for JSON file
applicable)		
	Distribution of the income generated by the UCI to investors	IncDistri
	Drawing-up of the subscription or redemption contract notes and the certificates of title and dispatch of such documents to the individual investors	DocDisp
	Other	Oth
NavFaPoliciesCombo	Conflict of Interests	Соі
	Client onboarding	CliOnb
	Identification and correct recording of all accounting movements in the UCI's books	AccMvt
	Valuation of assets	AssetsVal
	NAV calculation and publication	NavCalcPub
	Drawing-up of financial reports and other documents intended for investors	FinRepDraw
	Delegation	Delegation
	Other	Oth
NavFaDelegationsCombo	Identification and correct recording of all accounting movements in the UCI's books	AccMvt
	Valuation of assets	AssetsVal
	Calculation of the total NAV of the UCI	NavCalc



Reference (if applicable)	Label	Code for JSON file
	Publication of the UCI's NAV per unit/share	NavPub
	Drawing-up of financial reports and other documents intended for investors	FinRepDraw
	Other	Oth
CcPoliciesCombo	Conflict of interests	Соі
	Client onboarding	CliOnb
	Drawing-up of financial reports and other documents intended for investors	FinRepDraw
	Correspondenceanddispatchofofferingdocuments,financialreportsandotherdocumentsintendedforinvestors	CorrDispOfferFinRepDoc
	Drawing-up of the subscription or redemption contract notes and the certificates of title and dispatch of such documents to the individual investors	DocDrawDisp
	Delegation	Delegation
	Other	Oth
CcDelegationsCombo	Drawing-up of financial reports and other documents intended for investors	FinRepDraw





Reference (if applicable)	Label	Code for JSON file
	Correspondence and dispatch of offering documents, financial reports and other documents intended for investors	CorrDispOfferFinRepDoc
	Drawing-up of the subscription or redemption contract notes and the certificates of title and dispatch of such documents to the individual investors	DocDrawDisp
	Other	Oth



**Commission de Surveillance du Secteur Financier** 283, route d'Arlon L-2991 Luxembourg (+352) 26 25 1-1 direction@cssf.lu www.cssf.lu